

**COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Tidewater Regional Office**

**STATEMENT OF LEGAL AND FACTUAL BASIS
Significant Permit Modification**

ATC Panels, Incorporated
33322 North Lynn Road, Franklin, Virginia 23851
Permit No.: TRO-60171
Effective Date: May 17, 2004
Expiration Date: May 17, 2009

As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, ATC Panels, Incorporated, previously Nevamar Company, LLC, has applied for a significant permit modification to the Title V Operating Permit for its particleboard manufacturing facilities in Isle of Wight County, Virginia. The Department has reviewed the application and has prepared a modified Title V Operating Permit.

Engineer/Permit Contact:_____ Date:_____

Air Permit Manager:_____ Date:_____

Deputy Regional Director:_____ Date:_____

REQUESTED MODIFICATION

The Department received, on May 25, 2004, a request to change the owner name from Nevamar Co., LLC to Aconcagua Timber Corp. On July 2, 2004, the Tidewater Regional Office received a request from Aconcagua Timber Corp. to revise the currently permitted VOC emission factors for the particleboard press and cooler vents. The revised emission factors also change the resulting VOC emission limits in the New Source Review (NSR) and Title V permit. In a November 8, 2004 letter, the company requested an increase in the maximum hourly capacity of the press and cooler vents from 16,000 sq ft/hr to 20,000 sq ft/hr. The permitted annual throughput (tons/yr) limit for the combined press and cooler vents however, did not change. The hourly emission limits in the permit for these units was raised to coincide with the revised hourly maximum rates provided by the company. The NSR permit was amended on December 3, 2004.

This action raises the individual press and cooler vent VOC limits and the combined press and cooler vents VOC permit limit in the Title V permit. The combined limit for these vents is raised from 242 to 290 tons/yr (actual VOC emissions do not change). Since the net emissions increase, based on 1997 – '98 data and the revised emission factor, is calculated to be only 31.8 tons/yr, PSD permitting is not applicable to this action. Since the potential to emit (PTE) for formaldehyde, a currently regulated hazardous air pollutant (HAP), exceeds 10 tons/yr; this facility is a major source of HAPs. This facility is therefore subject to the requirements of 40 CFR 63 Subpart DDDD, National Emission Standards for Hazardous Air Pollutant (NESHAP) for Plywood and Composite Wood Products, which was promulgated on July 30, 2004, and DDDDD, NEHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters, effective September 13, 2004. The company submitted a letter, dated August 11, 2005, stating that they currently were not prepared to choose any compliance option from those specified in either MACT. Therefore, a new section in the Title V permit, section VI, has been added, entitled, "40 CFR 63 MACT Requirements". This section specifies that the permittee must comply generally with subpart DDDD and DDDDD limitations, reporting, monitoring, testing and recordkeeping requirements. No specific compliance options are specified. Emission limits for formaldehyde for the press and cooler vents, removed from the current underlying NSR permit in a September 26, 2005 amendment, have been removed from the Title V permit. These limits are no longer applicable because of the applicability of the Subpart DDDD MACT standard. If toxic pollutants are covered by a MACT standard then, in accordance with 9 VAC 5-60-300.C.4, those pollutants are exempt from the State toxics rule.

Also noted in the August 11, 2005 letter was a name change to the facility to ATC Panels, Inc.

CHANGES TO TITLE V OPERATING PERMIT

Front Page - Name change from Nevamar Company, LLC to ATC Panels, Incorporated.

Section I - Name change and Contact Person revision from Denise Wlodyka to Tom Garrahan.

Section II: Change date of currently cited NSR permit from 12/21/00 to 12/03/04 in all tables.

Change “Size/Rated Capacity” value for the particle board presses and coolers to 20,000 sq ft/hr.

Sections III, IV, V and VI: Change date of currently cited NSR permit from 12/21/00 to 12/03/04 in all conditions where applicable.

Part V.A. (Limitations): Modify hourly emission limits (conditions 3, 4 and 5) based on revised equipment capacity values (see section II, above).

Modify annual VOC emission limits (condition 6) based on revised emission factor supplied by the company.

Part VI.A, B and C. General MACT Requirements (DDDD – Plywood and Composite Wood Products and DDDDD – Boilers) added.

PUBLIC PARTICIPATION

The public participation requirements of 9 VAC 5-80-270 apply to significant permit modifications. The permit was placed on public notice in the Virginian Pilot from October 23, 2005 to November 22, 2005.

EPA comment period began October 23, 2005, and ended on December 7, 2005.

North Carolina has been notified of complete application.

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Tidewater Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Nevamar Company, LLC, Franklin Particleboard Plant
Franklin, Virginia
Permit No. TRO60171

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Nevamar Company, LLC, has applied for a Title V Operating Permit for its Franklin Particleboard Plant. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date: _____

Air Permit Manager: _____ Date: _____

Deputy Regional Director: _____ Date: _____

FACILITY INFORMATION

Permittee

Nevamar Company, LLC
33320 North Lynn Road
Franklin, Virginia 23851

Facility

Franklin Particleboard Plant
33320 North Lynn Road
Franklin, Virginia 23851

AFS ID No. 51-093-0018

SOURCE DESCRIPTION

SIC Code: 2493 - Particleboard Manufacturing Facility

Wood chips and shavings, sawdust and kiln-dried planer mill shavings are received via truck and directly from an adjacent planer mill facility. These materials, collectively referred to as wood dust, are processed and pressed together to make particleboard. The wood dust is stored both in a large storage building and outside in piles. Front-end loaders transport the wood dust from the storage area to a shuttle conveyor belt. From there, the material is transported to different bins according to the type of material being handled. The material goes through a series of screens, which separate wood dust according to particle size. Unacceptably large particles are sent to Pallman and Bauer refiners that reduce the size of the particles.

The material is sent to one of three dryers, large horizontally orientated cylinders, which turn as material is dropped in the end. The exhaust from a sander dust burner heats and dries the material in the dryers. A primary cyclone and a secondary cyclone control particulate emissions, from each of the dryers. The primary cyclones filter out the process material and the secondary cyclones filter out any remaining particulate and exhausts, via a stack, to the atmosphere. Each individual dryer processes a specific size of particles. Dryer #1 is for particles used to produce the core, center section, of the particleboard. Dryer #2 is for the fine particles used in the face or surface portion of the particleboard. Dryer #3 is a predryer that handles green material which is partially dried then sent to Dryer #2 for final drying.

Material exiting the dryers is transported on an above ground conveyor belt to storage silos. From the silos, the core and face material are transported to a blender cylinder where glue and wax are added. The material is then metered onto the caul sheet, a large metal sheet. The boards are made in three layers; bottom face, core, and top face. The faces are composed of the finest particles and the core is composed of the larger particles. After the layers are applied, it is weighed to ensure that it is the desired composition. Then the board goes through a steam powered hot plate hydraulic press with 21 openings. After being pressed, the 6 X 18-foot boards are unloaded and conveyed to a board cooler.

After being cooled, the boards are sent to a sander. The boards are sanded to the desired thickness. Sander dust waste from this operation is collected and sent to storage bins and is used for fuel in the boiler, which provides steam for the press, and the burner, which provides heat for the dryers. From the sander, the boards are sent to the warehouse where they cool for 48 hours. Then the boards are sent to one of three Schelling saws to be cut to various sizes depending upon the purchase orders. The wood dust generated from the sawing operation is blown back to the storage bin to be used in the production line.

The facility is a Title V major source of PM₁₀, NO_x, CO and VOC, as well as total Hazardous Air Pollutants. This source is a PSD-sized facility located in an attainment area for all pollutants, however, it has never been required to have a PSD permit. Certain of the equipment at this facility was previously permitted under a Minor NSR Permit, issued on June 30, 1995, and amended on December 21, 2000. This permit covers a 40 MMBtu/hr sander-dust burner, which generates heat used in three triple-pass wood chips/shavings dryers, a wood hog, and a particleboard press as well as several cyclones and fabric filters. A dual-fuel 50 MMBtu/hr boiler is not permitted, as it is an existing source (const. 1971). Two of the three triple-pass rotary wood-chip/shavings dryers were deemed exempt from NSR permitting in 1992 and 1996. The particleboard cooler and sander are also existing sources and are therefore not subject to New Source Review permitting.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSIONS INVENTORY

A copy of the 2002 Pollutant Emissions Summary Report and the permit application emission inventory is attached. Emissions are summarized in the following tables.

Actual Emissions

2002 Criteria Pollutant Emissions in Tons/Year (CEDS Pollutant Emissions Summary Report - attached)				
VOC	CO	SO ₂	PM ₁₀	NO _x
352.2	116.8	0.6	106.4	145.2

Facility Hazardous Air Pollutant Emissions

Pollutant	2002 Hazardous Air Pollutant Emission in Tons/Yr
Ammonia ¹	0.01
Chlorine ¹	0.1
Formaldehyde ¹	15.3
Methanol ¹	24.4
Acetaldehyde ²	2.5
Acrolein ²	0.9
Phenol ²	2.9
Propionaldehyde ²	0.4

¹ Data from VADEQ Pollutant Emissions Summary Report for 2002.

² Data from Nevamar's form 805, developed from avg. of 1997 and 1998 actual data.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
1P	1P-A	Babcock and Wilcox boiler, model no. FM10-61	- 47 MMBtu/hr using sander-dust for fuel; - 53 MMBtu/hr using #2 oil	Multi-clone	1PMC	PM	December 21, 2000
2P	See 18P, 19P & 20P, below	Coen Burner, model 230 FYR-COMPAK	40 MMBtu/hr using sander-dust for fuel	Controlled Sander-dust Input for max efficiency	(see 18P, 19P,20P)	PM	December 21, 2000
Raw Materials Screening, Refining and Drying Processes							
7P	7P-A	American Sheet Metal Bauer in-feed process cyclone (75%)	10 Oven-Dried Tons (ODT)	NA	NA	NA	December 21, 2000
10P	10P-A	Pneumafil Bauer out-feed process cyclone	10 ODT	NA	NA	NA	December 21, 2000
11P	11P-A	Pallman (#1 & #2) out-feed process cyclones	20 ODT	Pneumafil air filter	11PFF	PM	December 21, 2000
18P	18P-A	MEC Rotary drier (#1)	20 ODT	Cyclone	18PSC	PM	December 21, 2000
19P	19P-A	MEC Rotary drier (#2)	20 ODT	Cyclone	19PSC	PM	December 21, 2000
20P	20P-A	MEC Rotary drier (#3)	10 ODT	Cyclone	20PSC	PM	December 21, 2000
Particleboard Finishing Processes							
21P	21P-A,B& C	Part. Board Press	16,000 sq ft/hr	None	NA	PM	December 21, 2000
22P	22P-A & B	Part. Board Cooler	16,000 sq ft/hr	None	NA	PM	December 21, 2000
23P	(see 2P above)	Part. Board sander	12,000 linear ft/hr	Sanderdust reused in 1P & 2P, above	(see 18P, 19P,20P)	PM	December 21, 2000

EMISSION UNITS APPLICABLE REQUIREMENTS - Fuel Burning Equipment:

The fuel burning equipment associated with this particleboard manufacturing plant consists of one boiler and one sander-dust burner. The Babcock and Wilcox boiler, emission unit 1P (existing source), provides steam for the board press operations and uses either #2 fuel oil (53 MMBtu/hr) or sander-dust (47 MMBtu/hr) as fuel. The Coen sander-dust burner, unit 2P, is rated at 40 MMBtu/hr and provides the heat used in the 3 rotary dryers (units 18P, 19P and 20P).

Limitations

The following list of limitations specific to fuel burning equipment is from the December 21, 2000 New Source Review permit issued to International Paper - Particleboard Plant (formerly Union Camp, Inc., Building Products Division) and later transferred to Nevamar Company, LLC. The December 21, 2000 permit incorporated essential requirements from prior permits dated June 14, 1989, May 5, 1993, October 18, 1994, June 30, 1995 and November 17, 1995.

5. Particulate emissions from the Coen particleboard sanderdust burner (URN 2P) shall be controlled by three sets of primary and secondary cyclones. The process cyclones shall be provided with adequate access for inspection.
(9 VAC 5-50-260 and condition 5 of NSR permit dated December 21, 2000)
11. The approved fuels for the Coen burner (URN 2P) are particleboard sanderdust, and liquid propane gas (LPG) as a starter and pilot fuel. A change in the fuels may require a permit to modify and operate.
(9 VAC 5-80-10 and condition 11 of NSR permit dated December 21, 2000)
12. The Coen sanderdust burner (URN 2P) shall consume no more than 14,000 tons of particleboard sanderdust per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-50-260, 9 VAC 5-80-10 and condition 12 of NSR permit dated December 21, 2000)
13. The Coen sanderdust burner (URN 2P) shall consume no more than 80 pounds sanderdust per oven-dried ton of wood chips (ODT) from the three dryers (URN 18, 19, and 20), combined, calculated monthly as the ratio of the average pounds of sanderdust combusted during the previous twelve months, to the average tons of wood chips dried within the three dryers during the same period.
(9 VAC 5-50-260, 9 VAC 5-80-10 and condition 13 of NSR permit dated December 21, 2000)
19. Emissions from the operation of the Coen burner (URN 2P), firing particleboard sanderdust, shall not exceed the limits specified below:

Particulate Matter / PM-10	0.07 lb/million BTU	
Nitrogen Oxides	37.5 lbs/hr	105.0 tons/yr
Carbon Monoxide	7.5 lbs/hr	21.0 tons/yr

These emissions limits are derived from estimated overall emissions contributions from operating limits. Exceedance of operating limits shall be considered credible evidence of the exceedance of emissions limits. Compliance with these emissions limits may be determined as stated in Condition numbers 13, 25, and 26.
(9 VAC 5-50-260 and condition 19 of NSR permit dated December 21, 2000)

25. Visible emissions from the secondary cyclone on each dryer shall not exceed fifteen (15) percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed thirty (30) percent opacity, as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-50-80, 9 VAC 5-50-260 and condition 25 of NSR permit dated December 21, 2000)

Monitoring and Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. The following recordkeeping requirements for fuel burning equipment are from the December 21, 2000 New Source Review Permit.

26. The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Tidewater Regional Office. These records shall include, but are not limited to:
- d. Annual particleboard sanderdust throughput in the Coen burner, in tons, calculated as the sum of each consecutive 12-month period;
 - e. Annual throughput of wood shavings from the three dryers, combined, in oven-dried tons (ODT), calculated as the sum of each consecutive 12-month period;
 - f. Ratio of annual throughputs in Condition numbers 26(d) and 26(e), in units of pounds sanderdust per ODT, calculated monthly;

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-50-50 and condition 26 of NSR permit dated December 21, 2000)

Testing

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard. The following requirements are from the December 21, 2000 New Source Review Permit.

27. **Testing/Monitoring Ports** - The permitted facility shall be constructed so as to allow for emissions testing and monitoring upon reasonable notice at any time, using appropriate methods. Test ports shall be provided, when testing is required, at each baghouse and press vent stack in accordance with the applicable performance specification (reference 40 CFR Part 60, Appendix B).
(9 VAC 5-50-30 F and condition 27 of NSR permit dated December 21, 2000)

Streamlined Requirements None for fuel-burning equipment conditions.

EMISSION UNITS APPLICABLE REQUIREMENTS - Raw Materials Screening Refining and Drying Processes:

The screening, refining and drying equipment associated with this particleboard manufacturing plant consists of 2 wood hogs, 4 Pallman and 2 Bauer refiners, numerous process cyclones and screens, and 3 triple-pass rotary dryers.

Limitations

The following list of applicable requirements is from the December 21, 2000 New Source Review permit issued to International Paper - Particleboard Plant (formerly Union Camp, Inc., Building Products Division) and later transferred to Nevamar Company, LLC. The December 21, 2000 permit incorporated essential requirements from prior permits dated June 14, 1989, May 5, 1993, October 18, 1994, June 30, 1995 and November 17, 1995.

3. Wood furnish from the #5 Bin wood hog (URN 8P) shall be routed to a process cyclone. The process cyclone shall be provided with adequate access for inspection. An annual internal inspection shall be conducted on the process cyclone by the permittee to insure structural integrity.
(Condition 3 of NSR permit dated December 21, 2000)
4. Captured particulate emissions from the #2 Pallman fines screen, Schelling saws II and III, and the particleboard sander, shall be controlled by baghouses. Each baghouse shall be provided with adequate access for inspection, and shall be in operation when its associated screen, saw, or sander is operating.
(Condition 4 of NSR permit dated December 21, 2000)
7. Fugitive dust, and fugitive emission, controls shall include the following, or equivalent, as a minimum:
 - a. Reasonable precautions shall be taken to prevent fugitive particulate emissions from the collection, transfer, and handling of process materials at the facility; and
 - b. Volatile organic compounds shall not be intentionally spilled, discarded to sewers, stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution control practices for minimizing emissions.
(Condition 7 of NSR permit dated December 21, 2000)
8. The #5 Bin wood hog (URN 8P) shall consume no more than 85,200 tons per year of green wood, calculated monthly as the sum of each consecutive 12-month period.
(Condition 8 of NSR permit dated December 21, 2000)
9. The #2 Pallman fines screen shall process no more than 1,230 tons per year of wood fines, calculated monthly as the sum of each consecutive 12-month period.
(Condition 9 of NSR permit dated December 21, 2000)
14. Emissions from the operation of No. 5 Bin wood hog (URN 8P) ducted to, and emitted from the associated process cyclone exhaust shall not exceed the limits specified below:

Particulate Matter / PM-10	0.05 gr/dscf of exhaust gas	10.8 lbs/hr	46.0 tons/yr
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These emissions limits are derived from estimated overall emissions contributions from operating limits. Exceedance of operating limits shall be considered credible evidence of the exceedance of emissions limits. Compliance with these emissions limits may be determined as stated in Condition numbers 8, 24, and 26.

(Condition 14 of NSR permit dated December 21, 2000)

15. Operation of No. 2 Pallman Fines screen emitted at the associated baghouse vent shall not exceed the limits specified below:

Particulate Matter / PM-10 0.05 gr/dscf of exhaust gas 0.3 lbs/hr 0.9 tons/yr

These emissions limits are derived from estimated overall emissions contributions from operating limits. Exceedance of operating limits shall be considered credible evidence of the exceedance of emissions limits. Compliance with these emissions limits may be determined as stated in Condition numbers 9, 24, and 26.

(Condition 15 of NSR permit dated December 21, 2000)

25. Visible emissions from the secondary cyclone on each dryer shall not exceed fifteen (15) percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed thirty (30) percent opacity, as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).

(Condition 25 of NSR permit dated December 21, 2000)

Monitoring and Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. The following recordkeeping requirements for the screening, refining and drying equipment are from the December 21, 2000 New Source Review Permit.

26. The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Tidewater Regional Office. These records shall include, but are not limited to:

- a. Annual throughput of green wood through the No. 5 Bin Wood Hog (URN 8P), in tons, calculated monthly as the sum of each consecutive 12-month period;
- b. Annual throughput of wood fines processed by the #2 Pallman fines screen, in tons, calculated as the sum of each consecutive 12-month period;
- g. Results of annual cyclone inspections required by Condition number 3;
- h. All opacity data; and
- i. Maintenance records, training records, and written operating procedures specified in Condition number 32.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(Condition 26 of NSR permit dated December 21, 2000)

Testing

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard. The following requirements are from the December 21, 2000 New Source Review Permit.

27. The permitted facility shall be constructed so as to allow for emissions testing and monitoring upon reasonable notice at any time, using appropriate methods. Test ports shall be provided, when testing is required, at each baghouse and press vent stack in accordance with the applicable performance specification (reference 40 CFR Part 60, Appendix B).
(Condition 27 of NSR permit dated December 21, 2000)

Streamlined Requirements none for the screening, refining and drying equipment.

EMISSION UNITS APPLICABLE REQUIREMENTS - Particleboard Finishing Processes:

The finishing processes associated with this particleboard manufacturing plant consists of pressing, cooling, sanding and trimming saw operations, together with numerous process cyclones and fabric filters.

10. Throughputs for the press and cooler shall not exceed 140,160,000 square feet (on a ¾-inch board thickness basis) per year of wood particleboard, calculated monthly as the sum of each consecutive 12-month period.
(Condition 10 of NSR permit dated December 21, 2000)

16. Emissions from the operation of Schelling saw II ducted to and emitted from the associated baghouse vent shall not exceed the limits specified below:

Particulate Matter / PM-10	0.05 gr/dscf of exhaust gas	4.4 lbs/hr	10.7 tons/yr
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These emissions limits are derived from estimated overall emissions contributions from operating limits. Exceedance of operating limits shall be considered credible evidence of the exceedance of emissions limits. Compliance with these emissions limits may be determined as stated in Condition numbers 10, 24, and 26.
(Condition 16 of NSR permit dated December 21, 2000)

17. Emissions from the operation of Schelling saw III ducted to and emitted from the associated baghouse vent shall not exceed the limits specified below:

Particulate Matter / PM-10	0.05 gr/dscf of exhaust gas	1.1 lbs/hr	4.9 tons/yr
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These emissions limits are derived from estimated overall emissions contributions from operating limits. Exceedance of operating limits shall be considered credible evidence of the exceedance of emissions limits. Compliance with these emissions limits may be determined as stated in Condition numbers 10, 24, and 26.
(Condition 17 of NSR permit dated December 21, 2000)

- 18 Emissions from the operation of the particleboard sander ducted to and emitted from the vents of the two associated baghouses shall (individually) not exceed the limits specified below:

Particulate Matter / PM-10	0.05 gr/dscf of exhaust gas	0.4 lbs/hr	1.6 tons/yr
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These emissions limits are derived from estimated overall emissions contributions from operating limits. Exceedance of operating limits shall be considered credible evidence of the exceedance of emissions limits. Compliance with these emissions limits may be determined as stated in Condition numbers 10, 24, and 26.

(Condition 18 of NSR permit dated December 21, 2000)

20. Emissions from particleboard press vents 1 and 3 (individually) shall not exceed the limits specified below:

Particulate Matter / PM-10	0.05 gr/dscf of exhaust gas	1.4 lbs/hr
Nitrogen Oxides		0.1 lbs/hr
Volatile Organic Compounds		2.8 lbs/hr
Formaldehyde		0.24 lbs/hr

These emissions limits are derived from estimated overall emissions contributions from operating limits. Exceedance of operating limits shall be considered credible evidence of the exceedance of emissions limits. Compliance with these emissions limits may be determined as stated in Condition numbers 10 and 26.

(Condition 20 of NSR permit dated December 21, 2000)

21. Emissions from particleboard press vent 2 shall not exceed the limits specified below:

Particulate Matter / PM-10	0.05 gr/dscf of exhaust gas	5.5 lbs/hr
Nitrogen Oxides		0.3 lbs/hr
Volatile Organic Compounds		41.4 lbs/hr
Formaldehyde		4.14 lbs/hr

These emissions limits are derived from estimated overall emissions contributions from operating limits. Exceedance of operating limits shall be considered credible evidence of the exceedance of emissions limits. Compliance with these emissions limits may be determined as stated in Condition numbers 10 and 26.

(Condition 21 of NSR permit dated December 21, 2000)

22. Emissions from particleboard cooler vents 1 and 2 (individually) shall not exceed the limits specified below:

Particulate Matter / PM-10	0.05 gr/dscf of exhaust gas	0.7 lbs/hr
Volatile Organic Compounds		4.1 lbs/hr
Formaldehyde		0.17 lbs/hr

These emissions limits are derived from estimated overall emissions contributions from operating limits. Exceedance of operating limits shall be considered credible evidence of the exceedance of emissions limits. Compliance with these emissions limits may be determined as stated in Condition numbers 10 and 26.

(Condition 22 of NSR permit dated December 21, 2000)

23. Emissions from particleboard press vents 1, 2, and 3, and cooler vents 1 and 2, combined, shall not exceed the limits specified below:

Particulate Matter / PM-10	42.6 tons/yr
Nitrogen Oxides	2.6 tons/yr
Volatile Organic Compounds	241.9 tons/yr
Formaldehyde	21.7 tons/yr

These emissions limits are derived from estimated overall emissions contributions from operating limits. Exceedance of operating limits shall be considered credible evidence of the exceedance of emissions limits. Compliance with these emissions limits may be determined as stated in Condition numbers 10 and 26.

(Condition 23 of NSR permit dated December 21, 2000)

24. Visible emissions from each permitted process cyclone, baghouse, press vent, and cooler vent, shall not exceed five (5) percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed thirty (30) percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).
(Condition 24 of NSR permit dated December 21, 2000)

Monitoring and Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. The following recordkeeping requirements for the particleboard finishing equipment are from the December 21, 2000 New Source Review Permit.

26. The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Tidewater Regional Office. These records shall include, but are not limited to:
- c. Annual press throughput, in square feet (3/4-inch basis) of particleboard, calculated as the sum of each consecutive 12-month period;
 - h. All opacity data; and
 - i. Maintenance records, training records, and written operating procedures specified in Condition number 32.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(Condition 26 of NSR permit dated December 21, 2000)

Testing

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard. The following requirements are from the December 21, 2000 New Source Review Permit.

27. The permitted facility shall be constructed so as to allow for emissions testing and monitoring upon reasonable notice at any time, using appropriate methods. Test ports shall be provided, when testing is required, at each baghouse and press vent stack in accordance with the applicable performance specification (reference 40 CFR Part 60, Appendix B). (Condition 27 of NSR permit dated December 21, 2000)

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that applies to all Federal Operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

Conditions 28 through 36 in the December 21, 2000 NSR Permit are general conditions and are contained in the general condition section of the Title V permit. There is no need to repeat these conditions herein.

B. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by ' ' 2.1-20.01:2 and ' ' 10.1-1185 of the *Code of Virginia*, and the "Department of Environmental Quality Agency Policy Statement NO. 3-2001".

This general conditions cites the entire Article that follow:
Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Permits for Stationary Sources

This general condition cites the sections that follow:
9 VAC 5-80-80. Application
9 VAC 5-80-140. Permit Shield
9 VAC 5-80-150. Action on Permit Applications

F. Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excesses emissions reporting within 4 hours. Section 9 VAC 5-80-250 also requires malfunction reporting; however, reporting is required within 2 days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to this section including Title 5 facilities. Section 9 VAC 5-80-250 is from the Title 5 regulations. Title 5 facilities are subject to both Sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within 4 day time business hours of the malfunction.

In order for emission units to be relieved from the requirement to make a written report in 14 days the emission units must have continuous monitors and the continuous monitors must meet the requirements of 9 VAC 5-50-410 or 9 VAC 5-40-41.

This general condition cites the sections that follow:

- 9 VAC 5-40-41. Emissions Monitoring Procedures for Existing Sources
- 9 VAC 5-40-50. Notification, Records and Reporting
- 9 VAC 5-50-50. Notification, Records and Reporting

This general condition contains a citation from the Code of Federal Regulations as follows:
F.2.a. 40 CFR 60.13 (h). Monitoring Requirements.

J. Permit Modification

This general condition cites the sections that follow:

- 9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources
- 9 VAC 5-80-190. Changes to Permits.
- 9 VAC 5-80-260. Enforcement.
- 9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources
- 9 VAC 5-80-1790. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
- 9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in section 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

This general condition cites the sections that follow:

- 9 VAC 5-20-180. Facility and Control Equipment Maintenance or Malfunction
- 9 VAC 5-80-110. Permit Content

Y. Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 subpart M, National Emission Standards for Asbestos.

This general condition contains a citation from the Code of Federal Regulations that follow:
40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.
40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.
40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.

This general condition cites the regulatory sections that follow:
9 VAC 5-60-70. Designated Emissions Standards
9 VAC 5-80-110. Permit Content

STATE ONLY APPLICABLE REQUIREMENTS

The following Virginia Administrative Codes have specific requirements only enforceable by the State under 9 VAC 5-50-320, Toxic Pollutants, and have been identified as applicable by the applicant. The following requirement is from the December 21, 2000 New Source Review Permit:

6. To reduce offsite impacts of formaldehyde air emissions, the minimum stack height for Press Vent No. 2 (center vent) shall be 20 meters, and the maximum diameter for Press Vent No. 2 shall be 1.3 meters.
(9 VAC 5-50-260 and condition 6 of NSR permit dated December 21, 2000)

FUTURE APPLICABLE REQUIREMENTS

This facility will be subject to the Plywood and Composite Wood Products MACT, 40 CFR 63 Subpart DDDD, when this MACT is promulgated. However, this MACT has not yet been proposed. Therefore, this applicable requirement is considered a future applicable requirement.

INAPPLICABLE REQUIREMENTS

The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A 3 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

40 CFR Part 60, Subpart S. Maximum Achievable Control Technology (MACT) standards for pulp and paper in 40 CFR 60, Subpart S, and 9 VAC 5 Chapter 60, are not applicable. This plant was formerly a part of the Union Camp Pulp and Paper Mill, however, in April 1989, the paper mill was acquired by International Paper, and the particleboard plant became a separate entity. Although the paper mill does provide some raw materials to the particleboard plant, the particleboard plant is not dependent upon the paper mill except by convenience, therefore the facilities are not under common control and therefore not subject to the pulp and paper MACT.

40 CFR Part 63, Subpart JJ. MACT standards for wood furniture manufacturing in 40 CFR Part 63, Subpart JJ and 9 VAC 5 Chapter 60 are not applicable. This facility produces particleboard that may be used in furniture manufacturing at a later date by its customers.

40 CFR Part 63, Subpart DDDD, Plywood and Composite Wood Products MACT, will be applicable to this facility when promulgated. This MACT Standard has not yet been proposed.

Insignificant Emission Units

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110. Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation ¹ (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
3P	Shelling saw 1 process filter	5-80-720 .B	PM	5 tons/hr
4P	Shelling saw 2 process filter	5-80-720 .B	PM	10 tons/hr
5P	Shelling saw 3 process filter	5-80-720 .B	PM	5 tons/hr
6P	Storage Bins 1,2 & 3	5-80-720 .B	PM	22 tons/hr
8P	Pallman (#3 & #4) infeed filter	5-80-720 .B	PM	5 tons/hr
9P	#3 Dryer infeed cyclone	5-80-720 .B	PM	20 tons/hr
12P	Pallman (#3 & #4) outfeed filter	5-80-720 .B	PM	5 tons/hr
13P	Clean air filter	Unit Removed	PM, formaldehyde	2.6 tons/hr
14P	Forming rejects filter	5-80-720 .B	PM	9 tons/hr
15P	Process filters for press	5-80-720 .B	PM	5 tons/hr
16P	Process filters for N sander	5-80-720 .B	PM	5 tons/hr
17P	Process filters for S sander	5-80-720 .B	PM	5 tons/hr

¹The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit will be place on public notice in the _____ [newspaper] _____ from _____ [date] _____ to _____ [date] _____ .